

United States District Court
Eastern District of Michigan
Southern Division

United States of America

vs

Reginald Statom

08
No. 208-20669

Emergency Motion for Sentence Reduction Under
3582 (C)(1)(A) Compassionate Release

COMES NOW, movant Reginald Statom, pro se without the aid of counsel seeking a sentence reduction under compassionate release or in the alternative, the CARES Act of 2020.

Specifically, the COVID-19 infection has infiltrated several federal prisons throughout the United States. Once inside the prisons the infections have led to coronavirus at an uncontrollable rate.

Movant is in the category of persons that the centers for disease control considers high risk for serious complications or even death if it he becomes infected with the disease. Particularly, movant has respiratory problems. He has Asmanex Twisthaler, Albuterol Inhaler and Doxazosin for enlarged prostate. In addition, movant suffers from asthma.

Movant has served (65) percent of the term to which he was sentenced (205 months) and (71) percent of his good conduct time release (188 months).

Furthermore, movant is a low-level drug offender with no history of violence. Movant has a plan for lodging, income and medical care upon release. It is no stretch to call the prison environment extraordinary and compelling. If movant remains in this environment there is a high likelihood of his contracting COVID-19 from which he would not be expected to recover because movant cannot adequately practice self-care or social distancing and hygiene to minimize his risk of exposure, release to become confinement is a compassionate alternative to continued institutional incarceration.

Movant asserts that the BOP has not implemented constitutionally adequate measures to protect him from the serious threat posed by this unparalleled pandemic. The eight (8th) amendment grants mount the right to be protected from this disease

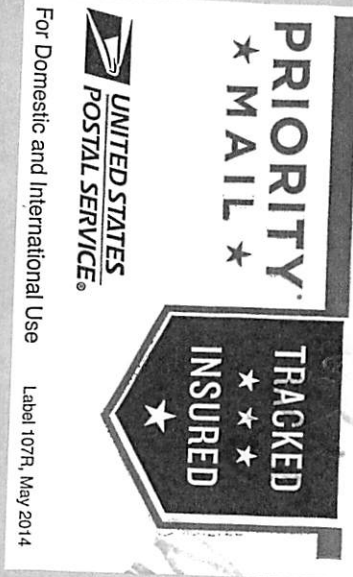
Sincerely,
Reginald H. Statom



Reggie Statom 17053-039

P.O. box 33

Terre Haute IN 47808



Hon. Robert H. Cleland
231 W. Lafayette Blvd
Detroit, MI 48226

9505 5109 8491 0099 1085 7



USPS TRACKING® NUMBER

SHIP TO:
231 W LAFAYETTE BLVD
DETROIT MI 48226-2700

EXPECTED DELIVERY DAY: 04/09/20

0

 **UNITED STATES
POSTAL SERVICE.** **Retail**

P

US POSTAGE PAID

\$7.50

Origin: 48601
04/08/20
2582760702-22

1

EXPECTED DELIVERY DAY: 04/09/20

C015

SHIP

TO:

231 W LAFAYETTE BLVD
DETROIT MI 48226-2700

USPS TRACKING® NUMBER



9505 5109 8491 0099 1085 73

Hon. Robert H. Cleland
231 W. Lafayette Blvd
Detroit, MI 48226

P.O. BOX 33

Terre Haute IN 47808



PRIORITY
★ MAIL ★



or Domestic and International Use Label 107R, May 2014